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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 IN RE: SOCIAL MEDIA ADOLESCENT  
11 ADDICTION/PERSONAL INJURY PRODUCTS  
12 LIABILITY LITIGATION

13 This Document Relates To:

14 *Breathitt County Board of Education v. Meta  
Platforms, Inc., et al.*

15 *Tucson Unified School District v. Meta Platforms,  
Inc., et al.*

16 *Charleston County School District v. Meta  
Platforms, Inc., et al.*

17 *Irvington Public Schools v. Meta Platforms, Inc., et  
al.*

18 *Dekalb County School District v. Meta Platforms,  
Inc., et al.*

19 *Board of Education of Harford County v. Meta  
Platforms, Inc., et al.*

10 MDL No. 3047

11 Case No. 4:22-md-03047-YGR (PHK)

12 **STIPULATION AND [PROPOSED]  
13 ORDER TO MODIFY SEALING ORDER  
14 WITH RESPECT TO MOTIONS SET  
15 FOR HEARING ON JANUARY 26, 2026**

16 Judge: Hon. Yvonne Gonzalez Rogers  
17 Magistrate Judge: Hon. Peter H. Kang

1 WHEREAS, the School District Plaintiffs (“Plaintiffs”) and the Defendants (“Parties”) have  
2 conferred about the materials filed by Plaintiffs on November 7, 2025, opposing the motions filed by  
3 Defendants that are set for hearing on January 26, 2026, i.e., Defendants’ Motions for Summary Judgment  
4 and Rule 702 Motions (the “1/26/26 Motions”);

5 WHEREAS, given the volume of materials filed, the Parties have negotiated the following  
6 extensions and modifications of the conferral and briefing deadlines set forth in the Court’s Joint  
7 Stipulation Modifying Temporary Sealing Procedure Deadline at Dkt. 341 (“Sealing Protocol”) with  
8 respect to the filings associated with the 1/26/26 Motions:

- 9 • November 18, 2025: Meta and YouTube transmit to Plaintiffs their proposed redactions to  
10 Plaintiffs’ Omnibus Opposition to Defendants’ Motions for Summary Judgment (the “Omnibus  
11 Opposition Brief”) (ECF 2414-1 (corrected version)) by close of business;
- 12 • November 19, 2025: Meta and YouTube confer with Plaintiffs on their proposed redactions to  
13 Plaintiffs’ Omnibus Opposition Brief;
- 14 • November 20, 2025: Snap and TikTok transmit to Plaintiffs their proposed redactions to Plaintiffs’  
15 Omnibus Opposition Brief, by close of business;
- 16 • November 21, 2025: Snap and TikTok confer with Plaintiffs on their proposed redactions to  
17 Plaintiffs’ Omnibus Opposition Brief;
- 18 • November 21, 2025: Plaintiffs lodge on public docket the less-redacted version of Plaintiffs’  
19 Omnibus Opposition Brief emerging from the parties’ conferrals;
- 20 • December 1, 2025: Parties confer on redactions to all other materials filed by Plaintiffs on  
21 November 7, 2025, *other than* the exhibits to Plaintiffs’ Omnibus Opposition Brief (“Non-Exhibit  
22 Materials”);
- 23 • December 10, 2025: Defendants file omnibus motions to seal pursuant to the Sealing Protocol  
24 concerning Plaintiffs’ Omnibus Opposition Brief and Non-Exhibit Materials;
- 25 • December 17, 2025: Plaintiffs file omnibus oppositions to Defendants’ omnibus motions to seal;  
26 and
- 27 • December 23, 2025: Defendants file replies in support of their omnibus motions to seal.

1 WHEREAS, Defendants filed a Motion to Strike the exhibits attached to Plaintiffs' Omnibus  
 2 Opposition Brief (Dkt. 2449), Plaintiffs intend to oppose that motion today, and the Parties intend to argue  
 3 the motion at the forthcoming Case Management Conference on November 19, 2025;

4 WHEREAS, the Parties have negotiated the following deadlines that will apply to sealing  
 5 conferrals and briefing related to the aforementioned exhibits:

- 6 • If the Defendants' Motion to Strike is denied by the Court, the Parties agree that the Defendants  
 7 will confer with Plaintiffs on redactions to those exhibits within 30 days after such order, and if  
 8 the Defendants' Motion to Strike is granted by the Court, there will be no need to confer on  
 9 redactions to those exhibits; and
- 10 • If the Defendants' Motion to Strike is granted in part by the Court by requiring Plaintiffs to re-file  
 11 excerpted exhibits as requested in the alternative by Defendants, the Parties agree that the  
 12 Defendants will confer with Plaintiffs on redactions to those re-filed exhibits within 14 days after  
 13 they are re-filed on the docket; and
- 14 • The Parties will separately negotiate, discuss, and propose to the Court deadlines pertaining to the  
 15 briefing of disputes regarding (i) the sealing of the exhibits to Plaintiffs' Omnibus Opposition  
 16 Brief; and (ii) the sealing of materials related to Defendants' opening and reply motions,  
 17 anticipating that such disputes would be briefed in January 2026;

18 WHEREAS, the Personal Injury Plaintiffs and State AGs also agree to the above deadlines to the  
 19 extent the filings at issue involve them (e.g., Non-Exhibit Materials directed to Defendants' Rule 702  
 20 Motions as to plaintiffs' general causation experts).

21 THEREFORE, the foregoing negotiated deadlines shall apply in lieu of those otherwise set in place  
 22 by the Sealing Protocol.

23  
 24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25  
 26 DATED: \_\_\_\_\_

27  
 28 \_\_\_\_\_  
 HON. YVONNE GONZALEZ ROGERS  
 UNITED STATES DISTRICT JUDGE

1 Respectfully submitted,

2 Date: November 17, 2025

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**FILER'S ATTESTATION**

I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 17, 2025

By: /s/ Previn Warren